

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Kevin Turner and Shawn Wooden,  
*on behalf of themselves and  
others similarly situated,*

Plaintiffs,

v.

National Football League and  
NFL Properties LLC,  
successor-in-interest to  
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

**SUPPLEMENTAL DECLARATION OF CHRISTOPHER A. SEEGER  
IN FURTHER SUPPORT OF  
CO-LEAD CLASS COUNSEL'S MOTION TO COMPEL  
(1) CASE STRATEGIES GROUP (F/K/A NFL CASE CONSULTING, LLC),  
IT STRATEGIES GROUP, INC., CRAIG SIENEMA, AND JAMES MCCABE; AND  
(2) LIBERTY SETTLEMENT SOLUTIONS, LLC,  
LIBERTY CONTINGENT RECEIVABLES, LLC, LIBERTY SETTLEMENT FUNDING,  
JMMHCS HOLDINGS, LLC, MARC HERMES,  
CRAIG SIENEMA, AND JAMES MCCABE  
TO RESPOND TO THE DISCOVERY REQUESTS PROPOUNDED  
IN ACCORDANCE WITH THE COURT'S ORDER OF JULY 19, 2017**

CHRISTOPHER A. SEEGER declares, pursuant to 28 U.S.C. § 1746, based upon his personal knowledge, information and belief, the following:

1. Having been appointed as Co-Lead Class Counsel, I am fully familiar with the matters set forth herein, including the procedural history of this litigation and the class-wide Settlement that this Court approved on April 22, 2015 (“Settlement”), as well as the facts and procedural history leading up to the Court’s issuance of the July 19, 2017 Order. I submit this Supplemental Declaration in further support of Co-Lead Class Counsel’s Motion to Compel (1) Case Strategies Group (F/K/A NFL Case Consulting, LLC), IT Strategies Group, Inc., Craig Sienema, and James McCabe; and (2) Liberty Settlement Solutions, LLC, Liberty Contingent Receivables, LLC, Liberty Settlement Funding, JMMHCs Holdings, LLC, Marc Hermes, Craig Sienema, and James McCabe to Respond to the Discovery Requests Propounded in Accordance with the Court’s Order of July 19, 2017.

2. Attached hereto as Exhibit A is the letter, dated May 17, 2017, from Richard L. Scheff, counsel for Case Strategies Group (f/k/a NFL Case Consulting, LLC), IT Strategies Group, Inc., Craig Sienema, and James McCabe (“CSG Entities”) and Liberty Settlement Solutions, LLC, Liberty Contingent Receivables, LLC, Liberty Settlement Funding, JMMHCs Holdings, LLC, Marc Hermes, Craig Sienema, and James McCabe (“Liberty Entities”).

3. Attached hereto as Exhibit B is an exemplar of the Interrogatories propounded by Co-Lead Class Counsel (“Class Counsel’s Interrogatories”) upon the seven law firms identified by the CSG Entities as being in their “network,” dated July 28, 2017.

4. Attached hereto as Exhibit C is the Response to Class Counsel’s Interrogatories by McMullin & Associates.

5. Attached hereto as Exhibit D is the Response to Class Counsel’s Interrogatories by the Dutton Law Group.

6. Attached hereto as Exhibit E is the Response to Class Counsel's Interrogatories by Reich & Binstock, LLP, with the names of their Class Member clients redacted.

7. Attached hereto as Exhibit F is the Response to Class Counsel's Interrogatories by The Law Office of Ronald T. Bevans, with the names of their Class Member clients redacted.

8. Attached hereto as Exhibit G is Response to Class Counsel's Interrogatories by McCall | Atten, which produced its clients' retainer agreements in redacted format.

9. Attached hereto as Exhibit H is the email from Jesse Dean-Kluger transmitted as the response to Class Counsel's Interrogatories, with the names and other identifying information regarding the firm's Class Member clients redacted.

10. Attached hereto as Exhibit I are the Objections to Class Counsel's Interrogatories by Farrell & Patel.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 5, 2017

/s/ Christopher A. Seeger  
CHRISTOPHER A. SEEGER  
Co-Lead Class Counsel